

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

**IN RE: NATIONAL PRESCRIPTION  
OPIATE LITIGATION**

**This document relates to:**

*City of Cleveland, et al. v. Purdue Pharma L.P., et al.*, Case No. 18-OP-45132;

*County of Cuyahoga, et al. v. Purdue Pharma L.P., et al.*, Case No. 17-OP-45004;

*County of Summit, et al. v. Purdue Pharma, L.P. et al.*, Case No. 18-OP-45090

**MDL No. 2804**

**Case No. 1:17-md-2804**

**Judge Dan Aaron Polster**

**PLAINTIFFS' MOTION FOR LEAVE TO  
FILE PLAINTIFFS' OMNIBUS  
OPPOSITION TO MANUFACTURER  
DEFENDANTS' JOINT OBJECTIONS  
AND PHARMACY DEFENDANTS'  
OBJECTIONS TO THE SPECIAL  
MASTER'S DISCOVERY RULINGS NO.  
2 AND 3 UNDER SEAL**

Pursuant to Local Rule 5.2, Plaintiffs seek leave of Court to file Plaintiffs' Omnibus Opposition to Manufacturer Defendants' Joint Objections and Pharmacy Defendants' Objections to the Special Master's Discovery Rulings No. 2 and 3 in the above-listed cases under seal on July 30, 2018.

Plaintiffs' Omnibus Opposition contains references to confidential information contained in documents produced by Defendants marked as "Confidential." Plaintiffs file this Motion and Proposed Order (attached as Exhibit A) to ensure compliance with CMO No. 2 (ECF Doc. 441). Plaintiffs will also file a redacted version of Plaintiffs' Omnibus Opposition in the public record.

WHEREFORE, Plaintiffs respectfully request that the Honorable Court grant Plaintiffs' Motion for Leave to File Plaintiffs' Omnibus Opposition to Manufacturer

Defendants' Joint Objections and Pharmacy Defendants' Objections to the Special Master's Discovery Rulings No. 2 and 3 Under Seal.

Dated July 30, 2018

Respectfully submitted,

s/Peter H. Weinberger

Peter H. Weinberger (0022076)

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*Plaintiffs' Co-Liaison Counsel*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 30<sup>th</sup> day of July 2018, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF System. Copies will be served upon counsel of record by, and may be obtained through, the Court CM/ECF Systems.

*s/Peter H. Weinberger*

Peter H. Weinberger

*Plaintiffs' Co-Liaison Counsel*